

EXHIBIT 13

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE
EASTERN DIVISION**

CONSOLIDATED INDUSTRIES, LLC)	
d/b/a WEATHER KING PORTABLE)	
BUILDINGS,)	
)	
Plaintiff,)	
)	Civil Action No. 1:22-cv-01230
v.)	
)	
JESSE A. MAUPIN, BARRY D.)	
HARRELL, ADRIAN S. HARROD,)	
LOGAN C. FEAGIN, STEPHANIE L.)	
GILLESPIE, RYAN E. BROWN, DANIEL)	
J. HERSHBERGER, BRIAN L. LASSEN,)	
ALEYNA LASSEN, and AMERICAN)	
BARN CO., LLC,)	
)	
Defendants.)	

**AMERICAN BARN CO., LLC'S FIRST SUPPLEMENTAL RESPONSES TO
PLAINTIFF'S FIRST SET OF INTERROGATORIES AND
REQUESTS FOR PRODUCTION**

American Barn Co., LLC by and through its attorneys, states the following First Supplemental Responses to Plaintiff's First Set of Interrogatories and Request for Production.

INTERROGATORIES

3. Identify each person or entity who has lent money to ABCO and, for each such person/entity: (a) set forth the nature, purpose, and amount of the loan; (b) set forth the dates of each loan; and (c) identify all documents related to the loan.

SUPPLEMENTAL RESPONSE:

Subject to and without waiving its previous objections, ABCO states that First Bank loaned it money for the formation of ABCO Rentals.

4. Identify each person or entity who has otherwise invested in or provided financial support to ABCO (other than identified in response to the preceding interrogatories) and, with respect to each such person/entity: (a) set forth the nature, purpose, and amount of the investment/contribution; (b) set forth the dates of each investment/contribution; and (c) identify all documents related to the investment/contribution.

SUPPLEMENTAL RESPONSE:

None.

DOCUMENT REQUESTS

30. All documents relating to the number of portable buildings sold by ABCO and its revenue and profits from the sale of buildings and other activities in the Portable Buildings Industry.

SUPPLEMENTAL RESPONSE:

ABCO will provide a spreadsheet providing this information. ABCO objects to this request as unduly broad, overly burdensome, and not proportional to the needs of the case.

Date: May 10, 2023

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